

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2019-326-E**

IN RE: South Carolina Energy Freedom Act                   )  
       (House Bill 3659) Proceeding to Address            )  
       S.C. Code Ann. Section 58-27-460(A)(1)           )  
       and S.C. Code Ann.                                        )  
       Section 58-27-460(A)(2)                                )  
       (Promulgation and Periodic Review of                )  
       Standards for Interconnection and Parallel        )  
       Operation of Generating Facilities to an            )  
       Electrical Utility's Distribution and                )  
       Transmission System)                                    )

**PETITION  
TO  
INTERVENE**

This Commission established Commission Docket 2019-326-E, on October 10, 2019, by way of Commission Directive Order 2019-728, dated October 9, 2019 and Commission Directive Order 2019-796, in this Docket, on November 15, 2019.

Petitioner herein is Southern Current LLC, (“Southern Current” or “Petitioner”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. Southern Current is a Delaware Limited Liability Corporation, duly organized and authorized to conduct business in the State of South Carolina with its principal place of business 1519 King Street Extension, Charleston, South Carolina 29405.

2. Southern Current is a solar and energy storage developer and integrator. Southern Current’s services include planning, consulting, design, system installation and maintenance and project development.

3. As a large-scale project developer, Southern Current has originated nearly 100 projects equaling 670 MW with another 350 MW of late stage projects with operational capability within the next two years. Southern Current controls a pipeline of approximately 3,000 MW of early to mid-stage utility scale projects. Southern Current's projects range in size from 1 to 100+ MW with a footprint across multiple regions of the U.S.

4. Therefore, Southern Current will be financially impacted by the important decision to be made by this Commission in this Docket, consistent with Section 58-27-460(A)(1), (A)(2), of the South Carolina Energy Freedom Act.

5. This Commission's compliance with Section 58-27-460(A)(1), (A)(2), will directly impact the operations of the Southern Current. Because Southern Current's substantial business interests are located throughout the State of South Carolina, Southern Current's business interests will be materially affected.

6. Petitioner's position is that Southern Current has a direct and substantial interest in this Docket and Petitioner's interests cannot be adequately addressed by any other party. Therefore, the decision of this Commission is important to the Petitioner from a financial and business standpoint. Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important decision to be made in this Docket.

7. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

8. The granting of Southern Current's Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

9. This Petition to Intervene is timely filed with this Commission.

10. Petitioner has previously received approval for intervention from this Commission, including Commission Docket 2015-8-E, Docket 2016-9-E, Docket 2016-2-E, Docket 2016-1-E, Docket 2016-3-E, Docket 2016-8-E, Docket 2017-1-E, Docket 2017-2-E, Docket 2017-3-E, Docket 2017-305-E, Docket 2017-332-E, Docket 2018-1-E and Docket 2018-2-E.

11. Southern Current is represented by counsel in this proceeding:

Richard L. Whitt,  
**WHITT LAW FIRM, LLC**  
401 Western Lane, Suite E  
Irmo, South Carolina 29063  
Telephone: (803) 995-7719  
Richard@RLWhitt.law

**WHEREFORE**, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as this Commission may deem just and proper.

Respectfully Submitted,

/s/Richard L. Whitt

**Whitt Law Firm, LLC**

401 Western Lane, Suite E

Irmo, South Carolina, 29063

(803) 995-7719

**Counsel for Petitioner, Southern Current LLC.**

March 16, 2020